

**WEIL, GOTSHAL & MANGES LLP**

Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

**KELLER BENVENUTTI KIM LLP**

Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (650) 636-9251

*Attorneys for Debtors and  
Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**RESPONSE TO NOTICE OF REQUEST  
AND REQUEST TO MEDIATE CLAIM  
OF KENNETH B. SALOMON AND FOR  
SANCTIONS**

Date: March 9, 2021  
Time: 10:00 a.m. (Pacific Time)  
Place: (Video Conference)  
United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as  
3 reorganized, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the  
4 “**Chapter 11 Cases**”) hereby responds to the *Notice of Request and Request to Mediate Claim of*  
5 *Kenneth B. Salomon and for Sanctions*, filed on January 29, 2021 [Docket No. 10054] (the  
6 “**Request**”) as follows:

7 Mr. Salomon’s proof of claim, Claim No. 1139 (the “**Claim**”), has been settled pursuant  
8 to the General ADR Procedures as approved by the *Order Approving ADR and Related*  
9 *Procedures for Resolving General Claims*, entered on September 25, 2020 [Docket No. 9148].

10 The issues with the Prime Clerk online portal referenced in the Request relate to a clerical  
11 error in the spelling of the hyperlink provided in the Offer Notice to Mr. Salomon. As the offer  
12 exchange process has been completed and the Claim settled, Mr. Salomon has not been  
13 prejudiced by the administrative difficulties surrounding his electronic submission of ADR-  
14 related documents.

15 For the reasons set forth above, Mr. Salomon’s request for mediation and sanctions  
16 should be denied as moot.

17 Dated: February 23, 2021

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

19 By: /s/ Dara L. Silveira  
20 Dara L. Silveira

21 *Attorneys for Debtors and Reorganized Debtors*